

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

WI-LAN INC.,

Plaintiff,

V.

HTC CORPORATION, HTC AMERICA,
INC., and EXEDEA, INC.,

Defendants.

Civil Action No. 2:11-CV-68
(**LEAD CASE**)

JURY TRIAL REQUESTED

WI-LAN INC.,

Plaintiff,

V.

APPLE, INC., et al.,

Defendants.

Civil Action No. 2:12-CV-600-JRG
(Consolidated Case)

JURY TRIAL REQUESTED

STIPULATION AND JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiff Wi-LAN Inc. (“Wi-LAN”) and Defendant Dell Inc. (“Dell”), by and through their counsel of record, hereby stipulate and request that the Court order as follows:

(1) Subject to the terms of the Confidential License And Settlement Agreement between Wi-LAN and Dell, all claims here at issue between Wi-LAN and Dell, including all claims presented by Wi-LAN's Complaints and all of Dell's counterclaims, shall be dismissed with prejudice; and

(2) Wi-LAN and Dell each shall bear their own costs and attorneys' fees.

Dated: June 18, 2013

McKOOL SMITH P.C.

/s/ Sam Baxter

Sam Baxter
Texas State Bar No. 01938000
104 East Houston Street, Suite 200
Marshall, Texas 75670
Telephone: (903) 923-9000
Facsimile: (903) 923-9099
sbaxter@mckoolsmith.com

Robert A. Cote
rcote@mckoolsmith.com
Laura A. Handley
Texas State Bar No. 24055024
lhandley@mckoolsmith.com
One Bryant Park, 47th Floor
New York, New York 10036
Telephone: (212) 402-9400
Facsimile: (212) 402-9444

ATTORNEYS FOR PLAINTIFF WI-LAN INC.

Dated: June 18, 2013

Respectfully submitted,

/s/ Kimball R. Anderson

Kimball R. Anderson
Illinois State Bar No. 49980
kanderson@winston.com
Kathleen B. Barry
Illinois State Bar No. 6274526
kbarry@winston.com
WINSTON & STRAWN LLP
35 West Wacker Drive
Chicago, IL 60601
Telephone: (312) 558-5600
Facsimile: (312) 558-5700

Deron R. Dacus
Texas State Bar No. 00790553
ddacus@dacusfirm.com
THE DACUS FIRM, PC
821 ESE Loop 323, Suite 430
Tyler, TX 75701

Telephone: (903) 705-1117
Facsimile: (903) 705-1117

Daniel T. Conrad
Texas State Bar No. 24026608
dtconrad@jonesday.com
Chijioke E. Offor
Texas State Bar No. 24065840
ceoffor@jonesday.com

JONES DAY
2727 North Harwood Street
Dallas, TX 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100

ATTORNEYS FOR DEFENDANT DELL INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was served upon
counsel of record via CM/ECF on June 18, 2013,

/s/ Sam Baxter
Sam Baxter